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ABSOLUTE DENTAL &
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAULINA KLEIP-SOTELO, an Individual,
Plaintiff,
vs.

ABSOLUTE DENTAL & ORTHODONTICS
PRADA, PLLC., a Domestic Professional
Limited Liability Company, DOES I -X; ROE
CORPORATIONS I -X.,
Defendant.

Case No. 2:20-cv-00021-KJD-DJA

**STIPULATION AND ORDER FOR
EXCEPTION TO ATTENDANCE
REQUIREMENT TO EXCUSE
DEFENDANT'S INSURANCE
REPRESENTATIVE FROM IN-PERSON
ATTENDANCE AT THE EARLY
NEUTRAL EVALUATION**

Defendant ABSOLUTE DENTAL & ORTHODONTICS PRADA, PLLC and Plaintiff
PAULINA KLEIP-SOTELO ("Plaintiff"), through their respective counsel of record, submit this
Stipulation respectfully requesting an exemption from the Early Neutral Evaluation ("ENE") in-person
attendance requirements for Defendant's insurance representative.¹

The Order Scheduling Early Neutral Evaluation ("ENE") Session (ECF #10) sets the ENE for
July 16, 2020, and requires a representative of the insurance carrier with authority to settle this matter
up to the full amount of the claim to be present. The assigned adjuster in this matter works in
Connecticut and will be unable to fly to Las Vegas due to COVID-19 related travel concerns and
restrictions. Thus, the parties request that this Court grant an exemption to the in-person attendance

¹ Defendant's client representative from Absolute Dental will be able to attend in-person.

1 requirement for the representative of Defendant's insurance carrier and allow the representative to
2 participate at the ENE telephonically for good cause.

3
4 Dated: June 22, 2020

5 Respectfully submitted,

Respectfully submitted,

6 /s/ Amy Thompson

/s/ Jenny L. Foley

7 WENDY M. KRINCEK, ESQ.
8 AMY THOMPSON, ESQ.
LITTLER MENDELSON, P.C.

JENNY L. FOLEY, Ph.D., ESQ.
MARTA D. KURSHUMOVA, ESQ.
HKM EMPLOYMENT ATTORNEYS

9 *Attorneys for Defendant*

Attorneys for Plaintiff

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12 **IT IS SO ORDERED.**

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14 Dated: June 23, 2020.

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16 
17 **UNITED STATES MAGISTRATE JUDGE**

18 4850-0500-1153.1 051901.1013